

## REMARKS

In the Official Action mailed on **May 3, 2005**, the Examiner reviewed claims 1-15, 17-29, and 31-36. Claims 1-15, 17-29 and 31-36 were rejected under 35 U.S.C. §102(b) as being anticipated by Srinivasan (USPN 5,799,309, hereinafter "Srinivasan").

### Rejections under 35 U.S.C. §102(b) and 35 U.S.C. §103(a)

Independent claims 1, 10, 17, 24, and 31-36 were rejected as being anticipated by Srinivasan. Applicant respectfully points out that Srinivasan teaches recursively retrieving all objects pointed to by objects that are returned by the top level query. This would can potentially result in major performance problems by **fetching** too many **objects that are not needed** by the application (see Srinivasan, col. 7, lines 41-49).

In contrast, the present invention **fetches only relevant** many-to-many **target objects** for a collection of source objects (see page 10, lines 17-21 of the instant application). This is beneficial because it reduces bandwidth requirements and storage requirements by not retrieving unwanted objects. There is nothing within Srinivasan, either explicit or implicit, which suggests fetching only relevant many-to-many target objects for a collection of source objects.

Accordingly, Applicant has amended independent claims 1, 10, 17, 24, and 31-36 to clarify that the present invention fetches only relevant many-to-many target objects for a collection of source objects. These amendments find support on page 10, lines 17-21 of the instant application.

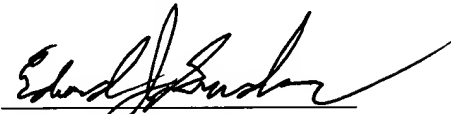
Hence, Applicant respectfully submits that independent claims 1, 10, 17, 24, and 31-36 as presently amended are in condition for allowance. Applicant also submits that claims 2-9, which depend upon claim 1, claims 11-15, which depend upon claim 10, claims 18-23, which depend upon claim 17, and claims

25-29, which depend upon claim 24, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

**CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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